

**AMERICAN COUNCIL OF SNOWMOBILE ASSOCIATIONS, INC.**

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May 29, 2002

Winter Use Draft SEIS Comments  
Grand Teton and Yellowstone National Parks  
Maintenance Building  
Grand Teton National Park  
Moose, WY 83012

**RE: Comments to Winter Use Draft SEIS**

Dear Planning Team:

The following comments are offered by the American Council of Snowmobile Associations, which represents 27 State Snowmobile Associations across the country.

We support the concepts contained in Alternative 2 of the SEIS which will allow snowmobile access to Yellowstone and Grand Teton National Parks and the John D Rockefeller, Jr. Memorial Parkway on an individual basis to continue.

The opportunity to see the Parks in the winter on our favorite mode of transportation is a dream to many snowmobilers. In many cases, it is a once in a lifetime opportunity. Individual travel in the Park is the only feasible mode of transportation that allows each individual to see the magnificent features that the Park offers.

The Winter Use planning process has provided the Parks with the opportunity to allow reasonable human access while preserving outstanding natural resources. We believe there is reasonable middle ground that will allow snowmobile access. We firmly believe that the current snowmobile use poses no threat to wildlife or the environment at the parks. And, with the technological advances that continue to surface along with the conversion to new, cleaner snowmobile that are already available, there should be no question about "potential" threats or "perceived" threats to the Park. This new technology will further reduce any impact on air quality in the parks.

It is also our understanding that there are a total of 65,000 snowmobiles that enter the Parks on an ANNUAL basis and 30,000 autos, buses and RVs on a DAILY basis. To unilaterally ban the smallest visitor group makes little or no sense if the concerns are truly threats to wildlife and/or the environment.

[www.snowmobiledirect.org](http://www.snowmobiledirect.org)

The snowmobile access is already very restricted – to less than 275 miles of existing roads in a 2.2 million acre Park. Banning individual transportation is, in effect, creating more Wilderness. It is our understanding that 2 million acres are already considered "Wilderness". It is mind-boggling to think that "The People's Park" is actually being turned into "Wilderness" which will eventually allow no entrance to the first and one of the most fascinating National Parks in our Country.

Many improvements have recently been made thanks to the new administrative staff in the Parks. Additional grooming, additional law enforcement and the advance sales of permits greatly enhanced visitor experiences this last winter. The organized snowmobile community has always strongly supported strict law enforcement – and we will continue to support additional law enforcement. While the advance sales of permits is certainly a huge improvement, it still seems there are improvements that the Park Service could make on the permits. It is cumbersome to have them attached to jackets – not only for the snowmobiler who must show the pass upon entrance, but also the ranger who is often straining to see the pass and check for valid dates.

The Park Service and the State of Wyoming have conducted many tests. Rather than the Snowmobile Association arguing the merits, we are hopeful that you will use the results of the scientific studies that were completed recently. Relying on outdated materials and pseudo-science does not serve the American public properly.

Economic impact is also a very big issue for many of our members. Without the hotels, motels, restaurants, gas stations and other necessary amenities, snowmobilers will no longer be able to visit the greater Yellowstone area. It is widely known that the snowmobile community is the backbone of rural-America in the winter. We hope you will take the economic impact of your decision into serious consideration.

In conclusion, the American Council of Snowmobile Associations continues to support reasonable snowmobile access to Yellowstone and Grand Teton National Parks and the John D Rockefeller, Jr. Memorial Parkway. We also continue to support strict enforcement of reasonable speed limits, entrance limits and adaptive management techniques.

As an association that represents over one million snowmobile enthusiasts, we are hopeful that your final decision will be an open-minded, fair decision and will take into consideration the impact your decision will have on all Americans. As always, if you have any questions, please feel free to contact us.

Sincerely,

Christine Jourdain  
Executive Director



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Winter Use Plan Comments  
Grand Teton and Yellowstone National Parks  
P.O. Box 352  
Moose, WY 83012

26 May 2002

Dear Sirs,

The Big Horn Mountain Country Coalition wishes to express support for Alternative #2 of the proposed Winter Use Plan for Yellowstone and Grand Teton National Parks and to the John D. Rockefeller, Jr., Memorial Parkway. Our General Board feels that it best represents the desired objectives. Alternative #2 makes reasonable concession to allow continued access to the parks. Alternative #2 advocates common sense management and restrictions that will allow continued snowmobile access to the park. Alternative #2 offers both interim standards and a long term strategy that would be immediately implemented. The strategy includes essential research coupled with adaptive management techniques to accommodate ever-changing conditions and scientific theories.

We want visitors to have a wide range of winter recreation opportunities. We support visitor access with minimal restrictions. A variety of winter use activities should be available without user conflict. Visitor safety should be paramount in all activities. But most of all the resources must be protected.

Alternative #2 allows snowmobile access to Yellowstone and Grand Teton National Parks on an individual basis. Individual travel by snowmobile provides a specific and unique activity for experiencing the area in the winter. It also provides for a reservation system. This should help the high use peak days that have led to overcrowding. This alternative supports allowing access by only the snowmobiles that will be produced under the yet to be finalized EPA regulations. The EPA is the expert and should be the agency that establishes emission standards for snowmobiles. And lastly, it requires a reduced speed limit from West Yellowstone to Old Faithful of 35 mph to reduce user conflicts and to increase safety. It provides for the strict enforcement of speed limits and other regulations such as those that prohibit off-road travel and protect wildlife.

Big Horn Mountain Country Coalition  
P.O. Box 719, Cowley, Wyoming 82420 • Phone/Fax (307) 548-6153

We support a reasonable level at which to regulate the sound of snowmobiles. This should be established by the appropriate federal agency and should become an industry standard. We also support the strict enforcement of speed limits, regulations that prohibit off-road travel and restrictions in wildlife winter ranges and fragile thermal areas. Wyoming wildlife is worth the watching and none of the wildlife should be stressed during the winter activities allowed in Yellowstone National Park.

The Park Service is encouraged to develop stronger partnerships with the surrounding communities, counties and states to expand educational opportunities that inform winter visitors regarding rules, user ethics, wildlife protection, visitor safety and appreciation of the natural resources.

The social and economic issues must be continuously monitored as part of this plan. Local businesses provide services to visitors near both parks, and many local economies rely on revenues from parks visitors in the winter.

The natural resources must also be monitored. Impacts of winter use on natural resources must not degrade the resource or put it in jeopardy. Yellowstone National Park must be available for future generations.

Thanks,

*Donald L. McCracken, Jr.*

Donald L. McCracken, Jr.

Executive Director

Big Horn Mountain Country Coalition



May 23, 2002

Planning Office  
Grand Teton National Park  
P.O. Box 352  
Moose, WY 83012

RE: Winter Use Draft Supplemental Environmental Impact Statement for the Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr. Memorial Parkway (DSEIS)

Dear Public Servants:

The BlueRibbon Coalition is a nationwide organization representing 600,000 motorized recreationists, equestrians, and resource users. We work with land managers to provide recreation opportunities, preserve resources, and promote cooperation with other public land users. We have a long history of involvement in planning processes for the Greater Yellowstone Area and in planning for Yellowstone Park, Grand Teton Park, and the Parkway. We were one of the plaintiffs in the lawsuit over the Final Environmental Impact Statement and Record of Decision for Winter Use; the settlement of which resulted in the SEIS process. Following are our comments on the DSEIS

#### CONDUCT OF THE PROCESS

Typically, we restrict our comments on planning documents to the documents specifically. However, this planning process has played out so dramatically in the national media that some comments are warranted. This dramatic spotlight on winter recreation has resulted in the following that affects the DSEIS content and review:

- Public discussion has been extremely polarized. In this tainted atmosphere, reviewers have great difficulty evaluating the DSEIS in an informed manner, and National Park Service (NPS) officials will have a great difficulty in evaluating and incorporating the comment they receive.
- NPS and other officials have actively encouraged and actually stimulated this extreme polarization. In the beginning of the process John Sacklin claimed he had not received sufficient information from snowmobile manufacturers. Additionally, the scoping comment period was extended unannounced and misleading "support snowmobile ban" percentages released with NPS approval. Finally, the grandstanding of employees who wore gas masks at the entrances, misleading releases about snowmobile infractions, and the release (with much fanfare) of the politicized EPA comments – which had not had supervisory approval, all cast a pall over the DSEIS. This kind of NPS misconduct does not serve the interest of the planning process or the resulting document.

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- Public trust in the professionalism of NPS officials has been violated. Regardless of the outcome of the DSEIS process, the public is now wary and suspicious of any NPS pronouncements or management actions. The public rightfully asks, "If this is how they view snowmobilers, can an unwarranted attack on my favorite activity be far behind?"
- NPS Director Fran Mainella has stated that welcomed visitors to National Parks will then become advocates for the protection of the Parks. After the NPS' participation in the polarizing winter recreation atmosphere, no visitor to Yellowstone should feel welcome.

#### EFFECTS OF THE ALTERNATIVES

The discussion of the effects of the alternatives is not informed within the context of what is appropriate and expected within each zone (how each alternative responds to different zones of activity is contained within the discussion of that alternative). So when the DSEIS states, "...alternatives 1a and 1b would improve the condition of the natural soundscape significantly," it is assuming that ambient sounds within a developed zone should move toward a wilderness-like condition. This expectation is not appropriate within a developed zone.

The discussion of air quality may not be accurate and may not reflect the most current information. Additionally it does not state that EPA air quality standards have NEVER been violated by the current level of activity.

The discussion on Socioeconomics does not accurately reflect the impact of winter recreation. Please incorporate the congressional testimony from the January 29, 2002 hearing conducted by Small Business Committee Chairman Don Manzullo.

The discussions on Natural Soundscape, Air Quality, Health and Safety and Visitor Access is predicated on vastly improved snowcoach technology, which exists now in concept only. When Visitor Access states, "All alternatives are intended to retain motorized oversnow access to accommodate average annual levels of visitation to the three park units," it does not consider the impacts of current snowcoaches which are six times more polluting than the new 4-stroke snowmobiles.

#### COMPARISON OF ALTERNATIVE FEATURES (Table S-1)

The sound discussion for Alternatives 1a and 1b (snowcoach only) reports the sound as 75 decibels phasing to 70 decibels. This is unrealistic since a 70 decibel snowcoach is only a concept, and is not even under development.

Alternative 2 is reported as 75 decibels and 78 decibels for snowmobiles and 75 decibels for snowcoaches. The DSEIS should acknowledge that this is only slightly more than the real-world sound standard in Alternatives 1a and 1b. Yet much of the rest of the document focuses on how much more noisy Alternatives 2 and 3 are than 1a and 1b.

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**PURPOSE AND NEED FOR ACTION**

The Introduction states, "The 990 Winter Use Plan projected 143,000 visitors for the year 2000. Winter visitors to YNP and GTNP in that year were respectively, 142,744 and 128,152....[management] recognized the trend toward increasing winter use and identified concerns..."

The errors perpetuated in this statement have been pointed out to NPS staff many times: at meetings, in draft comments and in FEIS comments. Yet, we see them once again in a planning document. First of all, the numbers reported do not reflect actual YNP winter visitation, but include traffic on Hwy. 191 to Big Sky and Bozeman. Second, they have not increased appreciably since 1990:

Look at these figures from Table 42 in the FEIS!

Year	Snowmobile Passengers
92/93	91,196
93/94	87,682
94/95	86,286
95/96	75,265
96/97	71,759
97/98	72,834
98/99	76,271
99/00	76,571
and updated in the DSEIS in Table 22	
00/01	84,971

Yet you repeatedly lie to the public, asserting that snowmobile visitation has ballooned! You lie to the press, and you lie throughout this document, in the example cited above and on page 100 when you state, "Over the past ten years increases in the number of visitors using snowmobiles in YNP and GTNP have intensified concerns regarding air pollution and its effects...."

Having many times called this misrepresentation to your attention, I feel I must be very blunt. These lies undermine any credibility that the DSEIS may have.

**NEW INFORMATION PURSUANT TO SEIS ANALYSIS**

The DSEIS states that all submitted information was reviewed and considered. It was not considered sufficiently, because it calls reports on actual snow machines that are "cleaner and quieter" concepts, and studies on current model snowcoaches as "under consideration" (Table 15). Meanwhile, the DSEIS continues elsewhere to reference snowcoach impact data from machines that have never been built.

The DSEIS should apply to snowcoaches the same comments it used to describe electric snowmobiles, "Information, though interesting, is speculative and insufficient for analysis purposes."

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The Socioeconomics - Winter Recreation Sector is vastly underreported. Please correct your analysis per information received by the State of Idaho, Wyoming, and Montana as well as snowmobile related businesses in West Yellowstone, Cody, and Jackson. Please incorporate those comments by reference in my comments.

Neither the FEIS nor the DSEIS has made any reference to legal obligations to comply with the Regulatory Flexibility Act (RFA) or the Small Business Enforcement Fairness Act (SBREFA). In 1980, The Regulatory Flexibility Act (RFA) was enacted to minimize the burden of federal regulations on small businesses. Under this act, agencies must determine whether a rule is expected to have a significant impact on small businesses.

In 1996, SBREFA was passed that gave some additional authority to RFA. Under SBREFA, Agencies' compliance is now subject to judicial review. SBA's Office of Advocacy can file amicus briefs in support of small businesses. Agencies must describe steps it has taken to minimize the impact of its regulation on small businesses.

SBREFA also provides for Congressional review if the economic impact of the proposed regulation would exceed \$100,000. Before any rule goes into effect, agencies are required to forward the rule to Congress for review. Major rules (\$100 million impact on the economy) can't go into effect until congressional review is complete. Congress may take up to 60 session days to review. Congressional review is subject to presidential veto. SBA Office of Advocacy is responsible for monitoring agencies.

Even the DSEIS' understated economic impact exceeds \$100,000. Any decision must therefore comply with RFA and SBREFA and be forwarded for to Congress for review before it is implemented.

The DSEIS' discussion on wildlife is heavily biased against snowmobiles, yet acknowledges that it cannot prove disturbance in an objective way. Instead, it makes much on a "survey" conducted by 20 likely biased (they probably were the ones who donned gas masks) employees. A typical visitor viewing experience might be counted as "harassment". For example:

I visited Yellowstone by snowmobile on January 4, 2002. Returning back from Old Faithful, we saw a coyote feeding on an elk carcass well off the road next to the river. We walked over to the edge of the road for a better view and watched the coyote dine for several minutes. A wildlife biologist was parked on the side of the road watching the watchers. After initiating a conversation, she stated that the coyote was "stressed" by the people, when it clearly appeared oblivious and continued to dine as people came and went.

My anecdotal experience should be just as good as yours.

The Natural Soundscapes discussion omits any reference to zoning, under which certain man-caused sounds are expected. Instead, it suggests that the entire Park should conform to a

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wilderness-like "soundscape" that has zero human-caused sounds. Under this extreme view, people should not be allowed to visit their parks at all.

The discussion on snowcoach sound cannot attain the full implementation of sound reduction as modeled, because the production snowcoaches do not exist that can meet the standards. Additionally, there is no mention of the fact that the interior of the current snowcoaches where passengers ride are so noisy that visitors must wear ear plugs.

Regarding air quality and emissions, please incorporate by reference the comments of the International Snowmobile Manufacturers Association (ISMA).

#### CONCLUSION

The BlueRibbon Coalition supports the DSEIS Alternative 2 as developed by the Cooperating Agencies with the following exception: Snowmobiles and especially snowplanes should be allowed on Jackson Lake in regulated numbers.

Snowplanes are not production machines. They are actually an historic forerunner of the modern snowmobile, home-built by a few local enthusiasts. They are an integral part of local winter custom and culture, and an interesting curiosity to other visitors. They are so few that impacts are minimal. They should be allowed, not only for the pleasure they provide to families, but because they represent an important part of local culture and history.

We urge the adoption of Alternative 2, modified as described above

Sincerely,



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### California-Nevada Snowmobile Association

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May 13, 2002

Planning Office  
Grand Teton and Yellowstone National Parks  
P.O. Box 352  
Moose, WY 83012

Re: Winter Use Draft SEIS Comments

Dear Planning Office:

The California Nevada Snowmobile Association appreciates this opportunity to provide these comments on the Winter Use Draft Supplemental Environmental Impact Statement for the Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr. Memorial Parkway. We are an all-volunteer organization that acts as a strong voice for the 32,000 registered snowmobile owners in the state of California. We stand in support of responsible and accountable multiple use of public lands while recognizing the need for conserving the quality of our environment and respecting the diversity of public land users.

We are troubled by the showcase arena that has evolved for the winter use planning within the Parks that seems to have now boiled down to a battle among the polarization of two sets of beliefs. One set of beliefs centers around the faltering idealism of multiple use of public lands built up through a proud cultural heritage and the other set reflects a warped sense of preservation that centers largely on intolerance and pursuit of an agenda (primarily elimination of motorized recreation) no matter what "facts" are brought to the table. Our constituents are even more concerned whether there is truly an unbiased process and unbiased agency(ies) that will sort the facts from the sheer momentum of a preconceived agenda. Knowing of this concern, we still offer these comments in the spirit of arriving at a logical winter use plan for these wonderful Parks.

In general, we are in support of Alternative 2 identified in the Draft SEIS. The California snowmobilers that travel to these Parks want to retain a winter experience that offers personal snowmobile travel opportunities, yet we realize there must be reasonable constraints and aggressive management. Accordingly, if there are certain facets of Alternative 2 that may need to be adjusted in order to still allow for individual snowmobile access (after thorough and equal weighting of all the facts), then Alternative 2 should still be the baseline. It is our belief that individual travel by snowmobile provides the best way to experience the awesome beauty and special character of the Parks in the winter. Consequently, we are opposed to the snowcoach-only access that is reflected in Alternatives 1a and 1b, since such approach to access eliminates the experience sought by the preponderance of winter visitors to the Parks. Similarly, for the same reason, we are opposed to Alternative 3 that would require all snowmobilers to be accompanied by a National Park Service ("NPS") permitted guide.

There are a good number of features in Alternative 2 that we believe makes this approach appropriate for a final winter use plan. We support the following concepts:

1. Implementation of a reservation system and interim daily entry limits for snowmobiles, based on historic daily averages, until a long-term visitor capacity study is completed. We also support spreading snowmobile use over a mid-December to mid-March winter season.
2. Advance sale of park entrance permits, but encourage the NPS to make them more readily visible to help reduce the bottleneck at entrance gates.
3. Lowering the speed limit to 35 mph from West Yellowstone to Old Faithful to improve safety, reduce sound levels and mitigate potential conflicts, plus strict enforcement of all posted speed limits within the Parks.
4. Requiring cleaner and quieter snowmobiles for entry to the Parks. However, the Environmental Protection Agency ("EPA") should determine appropriate emission levels for all snowmobiles, rather than the NPS dictating "park-only" regulations. Similarly, sound level regulation for snowmobiles should be established through appropriate processes using SAE test protocols.
5. Strict enforcement of regulations that prohibit off-road travel and restrictions on non-motorized uses in wildlife winter ranges and fragile thermal areas.
6. Increase groomed non-motorized trails and increase both the size and number of warming huts to help mitigate perceived user conflicts.
7. Guidelines restricting travel on Park roads from 8 pm until 7:30 am.
8. Expanding educational opportunities that inform winter visitors regarding Park rules, user ethics, visitor safety and appreciation of Park resources.
9. Fostering partnerships with the surrounding communities, counties and states. This should be expanded to include organized user groups.

There are several areas within the SEIS where we believe facts have been distorted or evaluation of more current data needs to be undertaken. First, we believe the NPS has

understated the potential impacts from snowcoaches in considering the merits of a snowcoach-only alternative. We ask the NPS to carefully reexamine the information on snowcoach emissions, air quality, sound and road impact that is attached to our comments as the first two pages of Exhibit A. We believe further investigation of this information will not support a snowcoach-only alternative as being the most appropriate access method for the Parks in formulating a winter use plan. Additionally, there are certain factual observations about air quality, wildlife impacts and overall snowmobile economics and demographic issues that we believe the NPS have not taken under full advisement in advance of developing a decision on a final winter use plan. We have included this information as the last three pages of Exhibit B. This should be carefully analyzed and understood before reaching a final decision.

Although we firmly believe the EPA should be the authority for determining reasonable emission standards for snowmobiles, we want to make further comments on this issue. The EPA has not yet formally issued standards for snowmobile emissions. However, we understand they will be forthcoming this year. Accordingly, it is inappropriate to prejudge what those standards will be and whether the industry can meet the new levels. It is certainly inappropriate to formulate any decision on early conjecture released by the U.S.-Ecosystem Protection Group April 29, 2002, particularly when there has been no violation of any emission standards by snowmobiles in the Parks that are currently in effect. We want to go on record as fully supporting the comments made by the International Snowmobile Manufacturers Association in their press release dated May 2, 2002, which is attached as Exhibit B to our comments.

Finally, we request the NPS arrive at a decision on a winter use plan that circumvents going through a whole analysis process to make minor changes in managing the Parks. The administration of an effective winter use plan will only be continually "stone walled" if there is not at least some room for making slight changes that will accommodate the general good of the Parks and allow for reasonable access.

In conclusion, we firmly believe the framework of Alternative 2 is the best composite of restrictions and forward-looking planning that can still allow for a quality snowmobile experience for the broadest spectrum of winter visitors. Your consideration of this perspective is greatly appreciated.

Sincerely,



Gregory S. Plummer, President

Attachments: Exhibit A

## Exhibit B

Exhibit A  
Page 1 of 5

## Supplemental Vehicle Sound Measurements

Conducted by: Jackson Hole Scientific Investigations for the Yellowstone/Grand Teton Winter Use Supplemental EIS  
Date: 2-6-02 Location: Yellowstone Natl. Park – So. Gate Background Sound Level: 35-40 dBA

Note: 1) Sound levels are logarithmic: +3 decibels = 2x sound level, -3 decibels = 1/2 sound level  
2) Maximum attainable snowcoach and van conversion speed was 30 mph  
3) All sound levels are displayed as decibels [dBA(A)] as measured in accordance with SAE Standard J-1161 and J-192 at a 50-foot pass-by

Vehicle Type & Information	20 mph Sound Level	30 mph Sound Level	35 mph Sound Level	45 mph Sound Level	Full Acceler. Sound Level	Idle Sound Level
Bombardier Snowcoach - 350 Chevy gasoline engine, dual high exhaust; average of 2 passes each direction	71.8	78.4	-	-	-	50.3
Bombardier Snowcoach - 318 Chrysler gas engine, dual low exhaust; average of 2 passes each direction	68.6	73.0	-	-	-	44.2
4-track (Mat-Track) Van Conversion - 1998 Chevy, 15-pass. van, gas engine; avg. 2 passes each direction	74.5	75.6	-	-	-	55.2
4-track (Mat-Track) Van Conversion - 1996 Ford, 15-pass. Van, gas engine; avg. 2 passes each direction	72.1	78.3	-	-	-	44.1
2-track Van Conversion - 1999 Ford, 15-passenger van, gas engine; average of 2 passes each direction	65.4	69.5	-	-	-	42.3
Groomer - Bombardier BR280; average of 1 pass each direction at 17 mph	74.0	-	-	-	-	-
4-stroke Snowmobile - 2002 Arctic Cat 4-stroke; average of 3 sleds and 2 passes each direction	65.8	-	72.0	72.3	70.5	42.1
4-stroke Snowmobile - 2002 Polaris Frontier; average of 3 sleds and 2 passes each direction	65.6	-	71.2	72.6	74.0	51.4
2-stroke Snowmobile - 2001 Polaris Sport Touring 550 (control sled used in previous sound testing by JHSJ)*	71.5	-	75.2	76.5	79.7	53.0
2-stroke Snowmobile - 2000 Yamaha Mountain Max 600*	68.8	-	72.9	73.6	78.8	55.1
2-stroke Snowmobile - 2001 Polaris Wide Track 500*	71.7	-	74.6	76.8	77.5	58.2
2-stroke Snowmobile - 2002 Polaris RMK 800*	-	-	72.8	74.3	-	-
2-stroke Snowmobile - 2001 Polaris RMK 800/SLP pipe*	75.1	-	77.8	79.7	84.9	70.2

\* All 2-stroke Snowmobile sound level measurements are the average of 2 passes each direction from 1 sled, except for the stock 800 RMK that was an average of 1 pass each direction.

Exhibit A  
Page 2 of 5

## THE TRUTH ABOUT ... Snowcoaches

- **Snowcoach emissions are nearly 6 times higher than CO emissions from the new generation snowmobiles.** Recent emissions testing of a snowcoach measured carbon monoxide (CO) at 99.2 grams/mile (g/m) when operated under full load. By comparison, a new Arctic Cat 4-stroke snowmobile operated under full load measures 17.29 g/m of CO. (Determination of Snowcoach Emissions Factor; Lela, White & Carroll, Southwest Research Institute; December, 2001).
- **The Yellowstone/Grand Teton Winter Use Final EIS and the Supplemental EIS understates CO emissions from snowcoaches by a factor of nearly 50%.** NPS improperly used emissions factors for light trucks to calculate potential air quality impacts from snowcoaches. A light truck emits 67.52 g/m of CO while a snowcoach emits 99.2 g/m. (Determination of Snowcoach Emissions Factor; Lela, White & Carroll, Southwest Research Institute; December, 2001). When converted to a tracked snowcoach, vans average only 2 to 4 miles per gallon of fuel versus 10 to 15 miles per gallon when used as a wheeled vehicle on highways.
- **It's a myth that snowcoaches would improve air quality because they carry more passengers.** Snowcoaches currently average 6 riders per coach while snowmobiles currently average 1.2 riders per sled. A total of 5 new generation snowmobiles would provide the same visitor transportation as one coach, but would have total CO emissions of 86.45 g/m compared to the one snowcoach with emissions of 99.2 g/m.
- **The Park Service has erroneously determined the 4-track conversions van to be the "current best available technology."** Page 222 of *Winter Use Plans - Draft SEIS, Vol. 1, March, 2002*, states that "For snowcoaches, only the 4-track conversion van vehicles were modeled in alternative 3, because they are the quietest available technology, with a sound level of 70 dBA at 50 ft., as compared with 75 dBA for the Bombardier." This is an incorrect determination that has led to a flawed impact analysis. During sound testing conducted at the Yellowstone South Entrance on February 6, 2002, 4-track vans produced a sound level of 75.6 dBA (diesel) and 78.3 dBA (gas). The Bombardier type snowcoach produced a sound level of 78.4 dBA (high exhaust) and 73.0 dBA (low exhaust), so a vehicle last produced in 1962 was quieter than NPS's "best available technology." Comparatively, new generation 4-stroke snowmobiles produced sound levels of 65.6 to 71.2 dBA. (Supplemental Over-Snow Vehicle Sound Level Measurement; Jackson Hole Scientific Investigations, February, 2002).
- **The 4-track conversion vans being promoted by the Park Service as the "current best available technology" are extremely damaging to groomed snow roads.** During the February 6, 2002, sound testing at the Yellowstone South Entrance, the 4-track conversion van cut 18" wide and 18" deep ruts in the groomed snow road after only

7 passes. Comparatively, after nearly 400 passes by snowmobiles and over 30 passes by other types of snowcoaches, there was no visible impact on the snow road.

**Exhibit A**  
**Page 3 of 5**

**THE TRUTH ABOUT ... AIR QUALITY**

**TRUTH:** There has never been any violation of ambient air quality standards in Yellowstone National Park. The air quality monitors were installed in October, 1998 and the results are reported regularly to the EPA.

**TRUTH:** A few of the employees at Yellowstone National Park chose to wear “filters” on President’s Day weekend this winter. The “filters” they wore do not provide any protection from carbon monoxide.

**TRUTH:** Snowmobiles are already restricted to 185 miles of the road system and create sound impacts only along the system. These impacts on the “natural soundscape” are less than the noise generated by over 1.5 million autos, buses, motorhomes, trucks and motorcycles that travel the full 275 mile paved road system in the spring, summer and fall.

**TRUTH:** Snowmobiles do not cause smog. Snowmobiles emit extremely low levels of Nitrous Oxide (Nox). The main contributing factor to smog in urban areas is Nox. Snowmobiles are not used in urban areas where smog is an issue.

**NON-TRUTH:** Snowmobiles cause smog. Snowmobiles caused Yellowstone employees to wear “gas masks.”

**Exhibit A**  
**Page 4 of 5**

**THE TRUTH ABOUT ... WILDLIFE**

**TRUTH:** In 1965 when snowmobiles were first allowed into Yellowstone National Park, there was a population of 388 bison. In 2001, there was a population of 3,400.

**TRUTH:** Elk, bison and other hoofed animals in Yellowstone National Park are not causing irreversible damage to vegetation in the park’s northern range, says a new National Academy of Science report. Wolves that were reintroduced to the park in 1995 should also be a factor in reducing the number of elk, their primary prey.

**TRUTH:** Wildlife is thriving in Yellowstone. Bison, elk and grizzly bear populations remain near record levels and wolves were successfully reintroduced in 1995. The populations of these animals – especially elk and bison – grew after the park adopted a controversial policy of natural regulation in the late 1960’s and stopped killing them in the park.

**TRUTH:** The 65,000 snowmobiles create less disturbance to wildlife than the 1.5 million autos, busses and trucks. All interaction between humans and wildlife can create “disturbance” and the only way to avoid such would be to put parks off limits (under glass if you will) and ban visitation.

**NON-TRUTH:** Snowmobiles have a negative impact on the wildlife population.



**Exhibit A  
Page 5 of 5**

**THE TRUTH ABOUT ... SNOWMOBILES**

**TRUTH:** There are more than 132,000 miles of groomed and marked trails in 27 states. The snowmobile trail system is designed to meet safety specifications which eliminate hazards. Trails are also designed to avoid environmentally sensitive areas and are built to strict environmental standards.

**TRUTH:** Over 99% of Yellowstone National Park remains roadless wilderness. Over two million acres of Yellowstone National Park remain undeveloped, untouched backcountry wilderness.

**TRUTH:** Only 1% of Yellowstone National Park's winter visitors are cross country skiers.

**TRUTH:** Total expenditures by snowmobilers on the sport in the U.S. and Canada are over \$9.4 billion annually.

**TRUTH:** The sport of snowmobiling is responsible for "spin-off" economic benefits and greatly depends on small businesses.

- Tens of thousands of jobs are created which enable those people to further stimulate the economy through additional expenditures on goods and services. These jobs provide significant income tax revenues to state and federal treasuries and dramatically reduce unemployment and welfare payments.
- Millions of dollars in tax revenues are derived from snowmobile-related businesses.
- Millions of dollars in winter tourism spending supports the rural snowbelt economies.
- Millions of dollars in local and state sales and gas tax revenues are generated by snowmobilers.

**TRUTH:** The snowmobile community spends millions of dollars each winter grooming and maintaining their sophisticated network of trails.

**CITIZENS FOR A USER FRIENDLY FOREST**

**"Red Meat, Board Feet, Dig Deep, Drive Jeep"**

May 28, 2002

Winter Use Draft SEIS Comments  
Grand Teton and Yellowstone National Parks  
P.O. Box 352  
Moose, WY 83012

Dear Public Servants:

Attached are our comments concerning the Winter Use Plan for Grand Teton and Yellowstone National Parks. We appreciate the opportunity to comment on this important Plan that has the potential to impair our use and enjoyment of the Parks.

I am writing on behalf of Citizens For A User Friendly Forest (CUFF), a loose-knit group of forest users in eastern Idaho. Our members consist of loggers and sawmill owners, snowmobilers, ranchers, OHV users, trailer-campers, and small businesses that depend on all of the other groups for their existence. We support the production of a wide variety of goods, services, and uses from our public lands, along with reasonable access to use and enjoy those resources. I tell you this not to stereotype ourselves, but to give you some idea of where we are coming from.

Following are our comments on the SEIS. We will discuss the points we feel are relevant to choosing the alternative that best meets our needs, plus our choice for that preferred alternative, and why.

**ANALYSIS OF IMPORTANT ISSUES**

**Air Quality**

There is no doubt "clean air" is important for the use and enjoyment of the Parks. The question is: How "clean" does clean air have to be to meet the fundamental purpose of the Park?

We note the fundamental purpose of the Park is to conserve park resources and values, while providing for the enjoyment of those resources and values by the American people (SEIS, Pg. 8). The dual purpose is coequal; neither is more important than the other.

It is unavoidable, therefore, that some impairment of air quality will result. With the presence of people, and their modes of transportation, comes some degradation of the Park resources. Congress knew that would happen, yet provided for public enjoyment of the Park anyway.

The Federal Clean Air Act requires the Environmental Protection Agency (EPA) to establish national ambient air quality standards to protect public health and welfare. EPA has established such standards for six pollutants in Yellowstone N.P. The states of Montana and Wyoming have

adopted more stringent standards for some of those pollutants.

Following is a comparison of two of those pollutants: carbon monoxide (CO) and particulate matter less than 10 microns (PM10) for Alternatives 1a and 2. Also included is the appropriate EPA or state standard for each pollutant. We use these two pollutants as surrogates for air quality in general because they seem to be the most important. We believe they give a fair estimate of the impact of snow machines (Alt. 2) versus snow coaches only (Alt. 1a) on air quality. The values are for W. Yellowstone, generally the area of greatest impact in the Park.

	CO, 1 Hr. Avg.	PM10, 24 Hr. Avg.
Alternative 1a.....	4.5 ppm	23.4 ug/m3
Alternative 2.....	7.9 ppm	40.9 ug/m3
National Standard.....	35 ppm	150 ug/m3
Montana Standard.....	23 ppm	150 ug/m3

The modeling results show that Alt. 1a contributes the lowest amount of 1 Hr. CO content, 4.5 ppm compared to 7.9 ppm for Alt. 2. Both are significantly below the Montana standard of 23 ppm (SEIS, Pg. 171). Likewise, Alt. 1a contributes only 23.4 ug/m3 of PM10 material to the air, compared to nearly double that of 40.9 ug/m3 for Alt. 2 (SEIS, Pg. 187). Both numbers are less than 70% of the national average allowed for clean air, however, so there is little practical difference between them.

To double check these results let's look at the modeled air quality results for the West Yellowstone - Madison Junction road segment, the busiest in the Park. Again we compare CO and PM10 for Alternatives 1a and 2.

	CO, 1Hr. Avg.	PM10, 24 Hr. Avg.
Alternative 1a.....	1.15 ppm	5.4 ug/m3
Alternative 2.....	2.39 ppm	11.96 ug/m3
National Standard.....	35 ppm	150 ug/m3
Montana Standard.....	23 ppm	150 ug/m3

Again the results show Alt. 1a is better than Alt. 2, but both are well below the national and state standards.

We return to the question: How "clean" does clean air have to be to meet the fundamental purpose of the Park? Is it important that one alternative is "cleaner" than another when both meet the national and state clean air standard? Maybe so, all other factors being equal. If there are tradeoffs associated with achieving the "cleaner air" however, the cost may not be

worth the benefit. We will address this point later.

### Soundscape

Section 4.9 of the 2001 NPS Management Policies document states "The NPS will preserve, to the greatest extent possible, the natural soundscapes of the park" and "...superintendents will identify what level of human-caused sound can be accepted within the management of the parks" and "...or that exceeds levels that have been identified as being acceptable to, or appropriate for, visitor uses at the sites being monitored" (SEIS, Pg. 11).

It is obvious from these excerpts that some level of human-caused noise was deemed acceptable in the NP system. The question is "How much? We note the 2001 Management Policy document does not say every acre of NPS land must be free of human-caused noise. There must be some balance between achievement of a naturally quiet environment, on one hand, and public use and enjoyment of the Park which entails some associated noise on the other.

In analyzing the effects of snow machines in Yellowstone N.P. we note the distance to the limit of audibility for snowmobiles on either side of the West Yellowstone - Madison Junction road segment is 12,459 feet in Alt. 2, while the same measure for snow coaches is 17,810 feet in Alt. 1a (SEIS, Pg. 229 and 231). Therefore, sound will be audible for an additional mile from the road in Alt. 1a compared to Alt. 2. We are not sure why this is true, but it does not suggest that snow coaches are quieter than snowmobiles.

Another way to analyze sound is to compare acres of the Park where vehicle noise will be heard. This analysis shows that 178,445 acres will be affected by over snow vehicle noise to some degree in Alt. 1a, compared to only 165,711 acres in Alt. 2 (SEIS, Pgs. 234 and 237). Again, Alt. 2 is less affected by noise than Alt. 1a. We note these acres account for only 7% of the Park in either case, however, which means 93% of the Park is free of human-caused sound. We think this is a significant statistic and will address it later.

It is true that the area with the greatest amount of noise (defined as audible over 50% of the time) is greatest in Alternative 2 (43,996 acres compared to only 12,916 acres in Alt 1a) (SEIS, Pgs. 234 and 237). This is a difference of 31,080 acres, which is large in terms of the number of acres affected. However, in terms of the big picture (the entire area of the two Parks) 31,080 acres is only 1% of the total Park soundscape. In other words, in the entire 2.5 million acres of the two Parks the "maximum" noise level of Alt. 2 exceeds that of Alt. 1a on an area equivalent to only 1% of the entire Park system. Is this a significant impact, or are the tradeoffs associated with achieving less "loud" noise in Alt. 1a greater than the relatively small amount of noise produced in Alt. 2? We will address this question later.

### Wildlife

According to the Affected Environment Section of the SEIS the following statements represent the affect snowmobiles have on big game:

Bison primarily used a network of well-established trails and travel routes, including riparian areas. Bison do use groomed and plowed roads, but use is considered **minor** compared to off-road travel (SEIS, Pg. 123).

Authors note that despite measured stress response, there **is no evidence** that current levels of snowmobile activity are affecting population dynamics for wolves or elk (SEIS, Pg. 124).

Bison and elk appeared to habituate as exposure to traffic increased throughout the winter recreation season. When comparing responses between wheeled vehicle activity and over snow vehicle activity, **no difference** was found in bison and elk behavior or distribution (SEIS, Pg. 125).

Overall, off-trail travel (skiers, snow shoers) induced the most behavioral responses in bison and elk (SEIS, Pg. 126).

The authors concluded that winter recreation in YNP is co-existing with bison and elk without causing declines in population levels, and that continued use of traditional winter range remains essentially unchanged despite a substantial increase in winter visitations (SEIS, Pg. 126).

As a result of the above the Affected Environment Section of the SEIS finds that under the current situation even though there are some conflicts, overall elk and bison are co-existing with winter recreation without declines in population levels (SEIS, Pg. 209). This section also states "Creel found no evidence that **current** snowmobile levels were affecting elk levels (Pg. 213) and that bison use of groomed trails is relatively minor (Pg. 214).

The SEIS does conclude that snowmobile use in the future will result in greater road mortality (of bison and elk), risk associated with harassment and displacement will increase, and physiological stress responses will rise due to higher traffic volumes (SEIS, Pg. 216). The document then points out that these conclusions are in dispute and the ramifications inconclusive (SEIS, Pg. 217).

In summary, the above data says the current effects of snowmobile use on big game is relatively minor and the predicted increased effects attributed to Alt. 2, relative to Alt. 1a, are in dispute and are controversial.

In other words, the scientific evidence supporting the negative effects of snowmobile use on big game is weak and theoretical and cannot be confirmed at this time.

#### Economics

A University of Wyoming statewide survey of snowmobiling in 2000-2001 produced the following information:

Snowmobile outfitters depend on snowmobile rental and guiding for about 92% of their

winter business, and 70% of total business (SEIS, Pg. 94).

57% of clients would change the number of trips made to Wyoming if they could no longer snowmobile in the Parks; 95% would decrease the number of trips (SEIS, Pg. 95).

70% of residents prefer there be no ban on snowmobiles (SEIS, Pg. 100).

Based on this information and a 1999 Winter Visitor Survey, the SEIS estimates that visitation to GYA by winter recreation users who live outside the 5-county area would be reduced by 33.4% if winter travel is restricted to snow coaches (SEIS, Pg. 152). As a result, total economic output in the 5-county GYA area would decline by \$21 million per year, year after year, if Alt. 1a is implemented. In addition, there could be a loss of \$2.9 million per year because of a reduction in aggregate nonmarket value of the reduced trips. This represents a total loss of \$23.9 million, every year, in the GYA area.

The IMPLAN input/output model predicts a majority of the 5-county impact (\$23.9 million) will be felt by the local West Yellowstone economy (SEIS, Pg. 156). Assuming 75% is a fair definition of majority, the economic loss to West Yellowstone from Alt. 1a will be **\$17.9 million** ( $23.9 \times .75$ ).

For Alt. 2 the 5-county loss is estimated to be between \$2.9 to 5.8 million (say \$4.3 million as an average), while the loss in the town of W. Yellowstone is expected to be 45% of that total, or \$1.9 million ( $\$4.3 \times .45$ ), plus about \$600 thousand for the loss of nonmarket value. The total combined loss for Alt. 2 therefore is **\$2.5 million**.

#### Visitor Experience

Winter activity at YNP is composed primarily of visitors on snowmobiles (62%); auto and bus (29%); snow coach (9%); and cross-country skiing (1%) (SEIS, Pg. 131).

The 2000-2001 Wyoming Study of state residents found 88.8% said there should be no ban on snowmobile use and if there was, 90% indicated they would not visit the Park if the only mechanized access was by snow coach (SEIS, Pgs. 141 and 143).

The government-knows-best, top-down approach of Alt. 1a will eliminate the current most popular form of winter experience (more than 60% of users) and will therefore have a major adverse effect on visitor experience to the Park (SEIS, Pg. 257). Alt. 2, by allowing snowmobile use to continue, with some modifications, will not degrade the overall winter experience.

#### Recommended Alternative

Given the above analysis, we overwhelmingly support Alt. 2 as our choice for the preferred alternative.

Alt. 2 has the least economic impact on West Yellowstone and the 5-county economic impact area. This difference is large and significant. Alt. 1a reduces the economic support to West

Yellowstone by \$17.9 million per year, while Alt. 2 reduces the economic support by about \$2.5 million per year. In the larger 5-county area Alt. 1a has a chilling effect on the economy of \$23.9 million, compared to about \$5 million for Alt. 2. We note these are multi-year effects, not one-year.

Alt. 2 also allows winter recreation use visitors to exercise their discretion as to which type of motorized use they choose to visit the Park in. Alt. 1a imposes a one-size-fits-all, Clintonese-era government-knows-best decision on everyone. We believe the American people are capable of making this choice for themselves.

Alt. 1a does result in "cleaner" air than Alt. 2, but we note both alternatives are less than 60% of the Montana carbon monoxide ambient air quality standard (Alt. 2 is 66% less, Alt. 1a is 81% less). If air is "clean" (that is, it meets EPA standards) is that not sufficient to meet the fundamental purpose for the establishment of the Parks? We believe it is and can find nothing in Park Policy that says otherwise.

From a sound standpoint we were surprised to learn that Alt. 2 actually is more noise-friendly than Alt. 1a. Alt. 1a produces human-sound on 178,445 acres, compared to only 165,711 acres in Alt. 2. This is not a big advantage, however, since both affect only about 7% of the entire Park. We think the significant factor here is that 93% of the Park is free of any human noise, regardless of which alternative is chosen. This should be more than sufficient for that 1% who use the Park for cross-country skiing and snow shoeing.

The slightly smaller area subject to sound in Alt. 2 is somewhat offset by the greater amount of "loud" noise (defined as audible over 50% of the time) in Alt. 2. The amount that Alt. 2 exceeds Alt. 1a is only 1% of the total park area however, so this is not a major factor either. Overall noise does not seem to be a determining factor in selecting the preferred alternative.


From a wildlife standpoint it is apparent that current snowmobile use is having only minor impact on big game. Individual bison and elk are occasionally harassed by machines, but there is no apparent effect on the population as a whole. The SEIS does postulate some potential negligible to moderate adverse and short term effects from motorized over snow use on bison and elk, but these effects are found to be in dispute and the ramifications inconclusive. Therefore we see no credible impact of snowmobiles on big game in the Parks.

In summary, we find the economic and freedom-of-choice advantages of Alt. 2 greatly outweigh the small and rather insignificant clean air advantage of Alt. 1a. One can argue the case for soundscape either way, but in either case it is insignificant. The effect of either alternative on big game is minor and in dispute, so we find this factor to be inconclusive. Therefore we feel the preponderance of the evidence in the SEIS supports Alt. 2. Alt. 2 achieves the best balance between conserving park resources while allowing the American people to use and enjoy those resources. We strongly recommend you select Alt. 2 as your preferred choice.

In a more specific comment, we urge you to allow snowmobile use between Grassy Lake and Flagg Ranch, as proposed in Alt. 2. Again, this is a freedom-of-choice decision we feel very strongly about. Our members have used this section of road for snowmobiling for decades.

There are no wildlife issues here to support a ban on snowmobile use. Please keep the Grassy Lake - Flagg Ranch road open to snowmobile use.

That concludes our comments. Thank you for the opportunity to comment on this important document.

  
Jim Gerber  
Pres CUFF

P.O. Box 514  
St. Anthony, ID 83445  
Ph. (208)624-3893



Winter Use Draft SEIS Comments  
Grand Teton and Yellowstone National Parks  
P. O. Box 352  
Moose, WY 83201

Date May 20, 2002

Dear Yellowstone and Grand Teton Park Management Team

The Cody Chamber of Commerce representing 620 members has reviewed the Draft SEIS (Winter Use Plans, Draft Supplemental Environmental Impact Statement, Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway). The Chamber strongly supports Alternative 2 and equally strongly rejects Alternative, 1a, 1b, and 3.

**Alternative 1a** is generally the result of the Record of Decision (ROD) and Alternative 1b is the same as 1a with a one-year delay. Alternative 1a like **Alternative 1b** would require snowcoach travel only managed by concessions permit. East Gate traffic would basically be denied winter access to Yellowstone without snowmobiles. This is due to the inability of the current snow coaches in Yellowstone National Park to navigate Sylvan Pass on a routine basis under present conditions. Among the reasons for this is that snow coaches are wider than snowmobiles, hence special grooming and plowing is required so that they can safely meet and pass oncoming traffic. Also, a snow coach is not built to accommodate the transverse slopes often generated by drifting snow. Sylvan Pass must be plowed and groomed on a routine basis to provide for snowcoaches. This would, in all likelihood, necessitate a groomer/plow to be stationed at the East Gate of Yellowstone National Park. The problems with snow coaches from the East Entrance are acknowledged in the Draft SEIS in Table 5 (Alternative 2) and Table 8 (Alternative 3), when it shows only snowmobiles from the East Entrance. We see no efforts mentioned to remedy this problem.

The economic damage to Cody and Park County would be significant. A document prepared by David T. Taylor of the University of Wyoming's Department of Agricultural and Applied Economics, published in August 2001, entitled *Economic Importance of the Winter Season to Park County, Wyoming* has been appended to the SEIS in Volume 2. Figure 6 of this publication shows the economic impact of Yellowstone National Park visitors on Park County, Wyoming. This document shows an economic impact of \$5.1 million in direct expenditures, \$8.7 million in total economic activity, \$1.8 million in personal income, 467 jobs and tax revenue of \$306,800. The dollar values are on an annual basis. Winter tourism in Yellowstone is increasing and we see no reason that the above figures can not grow in the future, given adequate winter access through the East Gate. We see no effort on the part of Yellowstone National Park or the National Park Service to mitigate this economic loss and the impact on our winter tourism would continue indefinitely. It was mentioned in the Draft SEIS (page 92) that Wyoming has submitted new data since the EIS. However, when we read in Table 10 of the Draft SEIS that other than in

West Yellowstone there would be "No measurable economic impact on other gateway communities" we become concerned. We seriously challenge this statement and ask that you consider our economic impacts. This may not be noted in terms of Gross Domestic Product but it certainly is on a local level with a county of about 25,000 population. We consider these alternatives (1a and 1b) as totally unacceptable as currently presented. Since the State of Wyoming and Park County are Cooperating Agencies in this process, please provide this economic impact document with the Final Supplemental EIS and consider the economic losses in your decision.

We consider **Alternative 3** as better than the previously mentioned alternatives but it is still unacceptable as presented. Admittedly it does allow snowmobiles through the East Gate of Yellowstone National Park but we consider the number too restrictive and the tour guide system is questionable. There is no mention of who could be a tour guide or what the limitations would be placed on travel, e.g., if one snowmobile wants to stop and look, would it be allowed? Other concerns to be addressed include the number of snowmobiles each guide will take, the number of times daily snowmobiles will be guided through each gate, etc. In our opinion this concept could detract greatly from the visitor's experience. One of the advantages of the individual snowmobile over the scheduled snow coach is that one can proceed at their leisure and stop, safely out of traffic, whenever one wants to take pictures and enjoy the beauty of Yellowstone in winter.

Snowmobiles, under this alternative, would be limited to the time frame of late November to President's Day. After that, snow coaches, skiers and snowshoers only would be allowed into Yellowstone National Park for the remainder of the winter season. Again, at the East Gate the snowcoaches will be of no value to us. These restrictions and the daily limit of 100 snowmobiles would, in our opinion, also cause economic harm to Cody and Park County, Wyoming. Admittedly, the economic damage under Alternative 3 would not be as great as denied entry to snowmobiles in Alternative 1a and 1b.

It is interesting to us that the Draft SEIS is showing air quality levels in Table 10 in Volume 1 of the Draft SEIS that are much less than those set forth by the National Ambient Air Quality Standards (NAAQS), that apply in Wyoming, or the Montana Ambient Air Quality Standards (MAAQS) for areas in Montana. We noted that apparently these figures for Flagg Ranch, West Yellowstone and the West Entrance to Madison were determined from modeling, as described in Chapter IV of the Draft SEIS. What is the purpose of these numbers other than to verify that the emissions will be less than required by NAAQS and MAAQS? It is also stated on page 202 of the Draft SEIS Volume 1 that "None of the predicted 24-hr average Pm10 concentrations exceeds the 24-hr average concentration of the Wyoming or NAAQS". Given this information we fail to see the justification for the proposed limitation on snowmobiles on the basis of air pollution. We also refer to the document by Cain and Coefield of the Monitoring and Data Management Bureau, Planning, Prevention and Assistance Division, Montana Department of

Environmental Quality, Dated 08/30/01. It is available on the web page: <http://www.deq.state.mt.us/cleansnowmobile/concerns/caincofield.pdf>. They show that 345 snowmobiles per hour could go through the West Yellowstone Gate and not exceed the MAAQS based on their pollution model. Our understanding is that the study of air quality does not consider all of Yellowstone Park but it is simply a study at selected points. If violations of air quality standards occur at the West Entrance area they should be addressed by making changes at that location. Proposing major changes to snowmobile uses in all of Yellowstone National Park, as opposed to site specific solutions, and the other areas covered in the Draft SEIS does not appear to meet the requirements of the National Environmental Policy Act (NEPA) as required by your regulations.

In all of this it is also curious to us that restrictions are being considered and there is not a winter carrying capacity already in place. *"The visitor carrying capacity component of adaptive management would incorporate the Visitor Experience Resource Protection (VERP) model (and others) and would be completed not later than 2005"* (Page 52 Draft SEIS). Although input from visitors is important, we believe that such visitor surveys should ask only questions that the respondent has the knowledge to respond accurately. We trust that you do not ask the visitor to speculate or respond to questions of a technical nature. One area of concern is when you are proposing to use visitor surveys to evaluate odors (Table 11, Draft SEIS). From what we have learned people evaluate odors as a result of impressions. Thus, the strength and whether or not the odor is repugnant will bias the results. Also if used with exhaust fumes and odors how does the traveling public tell the difference between automotive and snowmobile exhaust? We strongly recommend that when using Visitor Experience it be closely monitored with hard data from calibrated instrumentation, air photos and other quantifiable sources.

Reading the section in the Draft SEIS on noise and sound we realize that the specific over-snow vehicle, the speed of that vehicle, atmospheric and specific location of the sound measurement will impact the sound level noted. Since they are continually working on new snowmobile technology, quieter and less pollution, we would consider this a very difficult element to model. We presume that the limits shown in Tables 10 and 11 are only the results of modeling and not recommended enforcement guidelines at this time.

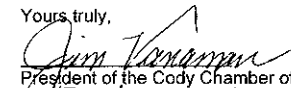
**Alternative 2** appears to us to be the most workable scenario presented in the current Draft SEIS. It allows snowmobiles to enter the East Gate of Yellowstone National Park on an individual basis from the second Wednesday in December until the second Sunday in March with the daily limit on East Gate snowmobile entry set at 200. We currently believe Alternative 2, in contrast to the other alternatives presented, will cause the least economic impact on Cody and Park County, Wyoming. Issues raised with Alternative 3 are also appropriate for here. These issues include air quality, noise, odor, carrying capacity, visitor experience questionnaires, calibrated instrumentation, etc. In the interest of brevity they have not been repeated but are included by reference. We trust that adaptive

management techniques will allow increased winter traffic through the East Gate as snowmobiles become cleaner and quieter in the years to come.

We strongly support Alternative 2. We sincerely hope that the National Park Service will endorse and support this alternative as a viable solution. It will provide control over snowmobiles that is now not in place and as a result will insure the values the Park Service has been mandated to maintain. Please realize that we too highly value the National Park System and for us Yellowstone is a very special place. We do not want it decimated but we also do not want it locked up or so tightly controlled that its beauty cannot be seen and enjoyed on an individual basis in all seasons. As required by NEPA significant impacts in the EIS/SEIS process should be minimized and Alternative 2 approaches that requirement.

We appreciate the opportunity to express the view of the Cody Chamber of Commerce.

Yours truly,

  
President of the Cody Chamber of Commerce

Printed Name  
836 Sheridan Ave  
Address  
Cody WY 82414  
City, State, Zip

**ILLINOIS ASSOCIATION OF SNOWMOBILE CLUBS, INC**  
**P.O. BOX 265**  
**MARSEILLES, IL 61341-0265**

May 25, 2002

Winter Use Draft SEIS Comments  
 Grand Teton and Yellowstone National Parks  
 P.O. Box 352  
 Moose, Wyoming, 83012

Dear Yellowstone and Grand Teton Park Management Team,

The Illinois Association of Snowmobile Clubs Inc (IASC) represents over 3200 snowmobiling families in Illinois. Many of our members have visited Yellowstone National Park in the past, and many hope to visit in the future. Every year, there are stories in our state publication, the *Illinois Snowmobiler*, about our members who have visited Yellowstone National Park and the surrounding areas. The stories always consider visiting the Park as the best part of their trip.

The IASC would hope that the new technology snowmobiles will be the answer to many of the issues currently at hand concerning Yellowstone National Park. The IASC believes that as long as cars and buses are allowed in the Park during the summer months (in much greater numbers) that we as recreational snowmobilers should be able to visit the Park in the winter, especially with the common sense approach provided by Alternative 2 of the SEIS.

The IASC would also hope that the work done by an Illinois Congressman, Don Manzullo of the 16<sup>th</sup> Congressional District of Illinois, would provide insight into the economic benefits that snowmobiling brings to the West Yellowstone area. I would hope that you take into account the economic issues raised during Congressman Manzullo's hearing in West Yellowstone on January 26<sup>th</sup>, 2002.

The IASC would also like to believe, that with all the turmoil in the world, and the restrictions being placed in so many of our other national buildings, that a family recreation such as snowmobiling in such a special place as Yellowstone would not be also restricted as proposed by former President Clinton.

The IASC hopes that "junk science" does not impair your decision. There have been many reports lately about inflated visitor numbers to the National Parks and Forests and lynx hairs being placed in traps where there have been no lynx. The IASC truly believes the newer technology snowmobiles are clean and efficient, and hopes you question the report from the Denver EPA office, as the IASC believes their comments fall under the "junk science" heading.

The IASC supports the concepts contained in Alternative 2 of the SEIS that was developed by the Cooperating Agencies because it continues to allow snowmobile access to Yellowstone and Grand Teton National Parks and to the John D Rockefeller, Jr. Memorial Parkway on an individual/personal basis. Individual travel by snowmobile provides the best way to experience the magnificent natural features of the Parks in the winter.

The IASC supports reasonable limits on snowmobiling, and in particular, supports the advanced sale of park entry permits and adequate National Park Rangers in place for security and guidance.

The IASC believes the speed limit from West Yellowstone to Old Faithful should be 35 mph. The IASC supports the strict enforcement of speed limits and regulations that prohibit off-road travel and, restrictions on non-motorized uses in wildlife winter ranges and fragile thermal areas.

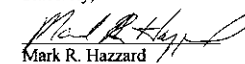
The IASC supports reasonable restrictions on snowmobiling in Yellowstone and Grand Teton National Parks and realizes that Yellowstone is a special place that needs special recognition.

The IASC also encourages you to use partnerships with the surrounding communities, counties and states to expand educational opportunities that inform winter visitors regarding Park rules, user ethics, visitor safety and appreciation of the Park resources.

The IASC is also hoping that you will adopt an Adaptive Management Plan for the Parks. In these days of constant technological advances, only a plan that can change with the times is fitting for the Park System.

Snowmobiling is a fun family sport, enjoyed by many snowmobiling families in Illinois and by many other Americans.

Sincerely,



Mark R. Hazzard  
 President - Illinois Association of Snowmobile Clubs, Inc



### Minnesota United Snowmobilers Association

7040 Lakeland Avenue North • Suite 212 • Brooklyn Park, Minnesota 55428-5616  
 Telephone: 763-577-0185 • Fax: 763-577-0186  
 Website: www.snowmobile-mnusa.org

May 28, 2002

Winter Use Draft SEIS Comments  
 Grand Teton and Yellowstone National Parks  
 P.O. Box 352  
 Moose, WY 83012

RE: Winter Use Draft SEIS Comments

Dear Yellowstone and Grand Teton Park Management Team:

The Minnesota United Snowmobilers Association (MnUSA) appreciates this opportunity to provide comments on the Winter Use Draft Supplemental Environmental Impact Statement (SEIS) for the Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway. We are a volunteer organization that acts as a strong voice for the 300,000 registered snowmobile owners in the state of Minnesota. We stand in support of a responsible multiple use and access to public lands.

In general, we are in support of Alternative 2 identified in the Draft SEIS. The hundreds of Minnesota snowmobilers that travel to these Parks would like a winter experience that offers continued personal snowmobile travel opportunities. We are opposed to the snowcoach only access and the proposal that would require all snowmobilers to be accompanied by a National Park Service permitted guide. We specifically support the following concepts in Alternative 2:

1. Implementation of a reservation system and interim daily entry limits for snowmobiles, based on historic daily averages, until a long-term visitor capacity study is completed. We also support spreading snowmobile use over a mid-December to mid-March winter season.
2. Advance sale of park entrance permits, but encourage you to make them larger and more visible to speed up lines at the gate.
3. Strict enforcement of all posted speed limits within the Parks.
4. Strict enforcement of regulations that prohibit off-road travel and restrictions on non-motorized uses in wildlife winter ranges and fragile thermal areas.
5. Increase groomed non-motorized trails and increase both the size and number of warming huts to help mitigate perceived user conflicts.
6. Expanding educational opportunities that inform winter visitors regarding Park rules, user ethics, visitor safety and appreciation of Park resources.
7. Fostering partnerships with the surrounding communities, counties and states. This could be expanded to include organized user groups.

With regard to emissions, the EPA has not yet formally issued standards for snowmobile emissions, however, we understand they are to be forthcoming this year. There has been no violation of any

Winter Use Draft SEIS Comments  
 May 28, 2002  
 Page Two

emission standards by snowmobiles in the Parks that are currently in effect. We expect new snowmobile technology required by the upcoming EPA standards, will address concerns of snowmobile emissions and ask the NPS to include the new standards in its determination. We have concerns of snowcoach emissions as we believe the potential impacts have been understated. (See attached.) We believe further investigation will not support a snowcoach only alternative as being the most appropriate access method for the Parks in formulating a winter use plan.

We firmly the framework of Alternative 2 is the best composite of restrictions and forward-looking planning that can still allow for a quality snowmobile experience for the broadest spectrum of winter visitors. Your consideration of this perspective is greatly appreciated.

Sincerely,

Minnesota United Snowmobilers Association

Douglas Swanson, Vice President

/jm

Enclosure





May 21, 2002

Winter Use Draft SEIS Comments  
Grand Teton and Yellowstone National Parks  
P.O. Box 352  
Moose, WY 83012

Dear Superintendent:

The Montana Tourism Coalition opposes the snowmobile ban being considered by the National Park Service. Anything that "bans" access by one group over another is unreasonable public policy. We support Alternative 2 that was developed by the Cooperating Agencies because it allows access on an individual/personal basis.

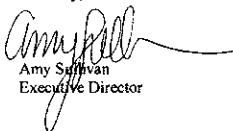
We are opposed to a ban because it eliminates yet another access possibility for the people of the United States. At what point does Yellowstone become a wilderness ecosystem that can only be viewed from outside a bubble? Our forefathers intentions were clear when they said Yellowstone National Park was created as a "public park or pleasuring-ground for the benefit and enjoyment of the people." In order for the public to understand nature they need to see, hear, feel, smell and taste it. There exists today many places where people are excluded from their natural environment and, although, we do not wish for people to love Yellowstone National Park to death, we also need to be sure that future generations are allowed to experience it through all their senses.

Our organization is also concerned about the economic impact to gateway communities that have benefited from the winter use of snowmobiles. It does not seem right that this opportunity be taken away from them altogether, especially when they are willing and have been willing to work with all interested parties to come up with consensus on the issue.

Let's keep Yellowstone open to all while at the same time protecting the park for all. It can be done and should be done.

Thank you for your help in this matter.

Sincerely,

  
Amy Sullivan  
Executive Director

## MOORE SMITH BUXTON & TURCKE, CHARTERED

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May 28, 2002

Delivered via Federal Express and  
E-Mail to grte\_winter\_use\_seis@nps.gov

Winter Use Draft SEIS Comments  
Grand Teton and Yellowstone National Parks  
Maintenance Building  
Grand Teton National Park  
Moose, WY 83012

**RE: Comments to Winter Use Draft SEIS**

Dear Planning Team:

Enclosed please find comments responding to the Winter Use Plans Supplemental Draft Environmental Impact Statement (the "DSEIS") issued on March 29, 2002, by the Yellowstone National and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway (the "Parks"). These comments are submitted on behalf of our clients the BlueRibbon Coalition, Inc., the Idaho State Snowmobile Association, and the Montana Snowmobile Association. Please note that these organizations, or any of their members, may submit additional comments, and any such comments shall supplement these comments and must be separately considered by the agency. In addition, we follow the agency's lead and note that we incorporate by reference our prior comments to applicable portions of the FEIS and preceding portions of the Winter Use planning process.

### I. Introduction.

The ongoing Winter Use planning process provides the Parks with the opportunity to allow reasonable human access while preserving outstanding natural resources. These goals need

Winter Use DSEIS Comments  
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not conflict with one another as suggested by some interest groups. Opponents of snowmobile access suggest that the Parks are irretrievably "broken" so long as any snowmobile access occurs. On the other end of the spectrum, some oppose any governmental restrictions on snowmobile access and advocate a pure "laissez-faire" management approach. Our clients believe a reasonable middle ground exists.

Without assigning blame for existing management, improvements to the status quo are overdue. Administrative issues such as grooming, permit issuance, and "traffic" rules can all be modified to enhance visitor experiences while increasing resource protection. The time has come for reasonable equipment and access restrictions in the Parks and many NPS units. Our clients strongly support enhanced law enforcement. Certainly a more aggressive official law enforcement presence is needed, but the agency must also become more open to the opportunities to "partner" with local interests and enthusiast organizations with a stake in proper care for park resources and adherence to regulations. These concepts can allow historical human visitation levels to the Parks, which are critical to the socioeconomic fabric of gateway communities. Alternative 2 strikes the best balance to the labyrinth of issues before the agency.

The increasingly vocal "silent majority" supports continued snowmobile access to the Parks. Opponents of snowmobile access, including some NPS employees, have persistently mischaracterized the nature of this process and those who support reasonable snowmobile access. The DSEIS certainly follows from the settlement agreement in *International Snowmobile Manufacturers Ass'n, et al. v. Norton*, Case No. 00-CV-0229-B (D. Wyoming). ISMA's position as "lead plaintiff" in the latest suit does not mean the "snowmobile industry" is responsible for, or even leading, the charge to protect reasonable snowmobile access to the Parks. Named plaintiffs in the suit include the BlueRibbon Coalition, the Wyoming State Snowmobile Association, Edward Dougherty, David and Jamie McCray, and Craig Koll. The State of Wyoming intervened as a party-plaintiff and has actively participated in the litigation and the planning process. Mr. Dougherty was the "lead party" for the "snowmobile interests" in the Fund for Animal's prior lawsuits over snowmobile access to the Parks. Truthfully, snowmobile access to the Parks plays a trivial part in the "bottom line" of the snowmobile manufacturing industry. More "snowmobile days" are logged in a busy weekend in the Great Lakes region than a season in Yellowstone. Well-moneyed opponents to human access have succeeded in portraying this as a battle waged by a profit-blinded "snowmobile industry" but in reality a diverse coalition of Americans, including grassroots enthusiasts and enthusiast organizations, affected state and local governments, local residents and businesses, and multiple use advocates, in addition to snowmobile manufacturers, supports reasonable snowmobile access to the Parks.

The Parks' winter use planning process has been long and tiring. We will not present exhaustive comments rehashing every issue. Our comments will focus upon what have now become the key issues in this process: Wildlife, Air Quality, Visitor Services and Socioeconomics issues. In addition, we will identify several procedural concerns raised by the

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manner of preparing and presenting the DSEIS. On balance, we believe DSEIS Alternative 2 provides the most reasonable and most defensible "middle ground" between unrestricted access to, and prohibition of humans from, the Parks.

## II. Wildlife Issues.

The DSEIS analysis of wildlife<sup>1</sup> issues turns upon an unprecedented and dangerous interpretation of NPS management direction. Drafters of the DSEIS have determined that existing regulations "prohibit snowmobile use that 'disturbs wildlife...'" and conclude that "NPS does not have the authority to allow snowmobile use where disturbance occurs." DSEIS at 119 (citing 36 C.F.R. 2.18). The DSEIS drafters create their own definitions of key terms to be used in this analysis. For example, "disturbance" is defined as "to interfere with, or destroy the tranquility or composure of wildlife." The decisionmaker, NPS and Department of Interior officials should carefully consider the implications of this analysis. If adopted, this logic must lead to gradual elimination of humans from all NPS "ecospheres."

One seeking to prohibit wildlife "disturbance" under NPS regulations cannot stop at snowmobile use. The DSEIS drafters correctly note 36 C.F.R. § 2.18 generally addresses snowmobile management in the NPS system and allows the agency to authorize snowmobile use when it "will not disturb wildlife or damage park resources." 36 C.F.R. § 2.18. However, conspicuously absent from the DSEIS is mention of broader proscriptions on wildlife "disturbance" which apply to all activities in National Parks. For instance, the first regulation at 36 C.F.R. part 2 states, "the following is prohibited: (1) Possessing, destroying, injuring, defacing, removing, digging, or disturbing from its natural state: (i) Living or dead wildlife or fish..." 36 C.F.R. § 2.1(a) (emphasis added). Similarly, the regulations prohibit "feeding, touching, teasing, frightening or intentional disturbing of wildlife nesting, breeding or other activities." 36 C.F.R. § 2.2(a)(2) (emphasis added). Whatever prohibition exists on "disturbance" attributable to snowmobiles must also address all human<sup>2</sup> behavior in Parks. The drafters of the DSEIS apparently hope to wield section 2.18 as a scalpel to excise snowmobile use, but fail to acknowledge their approach must also unsheathe the sledgehammer in other regulations affecting all human activities.

<sup>1</sup> As in the DSEIS, our reference to "wildlife" is limited to the species "of concern within the scope of the SEIS, bison and elk." DSEIS at p. 115.

<sup>2</sup> The NPS regulations are not expressly restricted to human behavior. Presumably the drafters of the regulations were aware that animals and other forces of nature routinely "frighten" or "disturb" wildlife, therefore we interpret the regulations to exempt such "natural" disturbance.

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The true flaw in the DSEIS "wildlife disturbance" analysis lies not in the regulations, but in the DSEIS definitions. To state the "disturbance" definition reveals its flaws. The scientific "standard" within the definition is whether an animal's "tranquility" or "composure" have been "interfered" with. These value-laden terms are not susceptible to objective research. In fact, they are not terms used by wildlife biologists or other scientists. Instead, these wildlife "professionals" focus on objectively measurable and quantifiable constructs such as fecal glucocorticoid levels. *See*, DSEIS at 125. A critical "disconnect" occurs between objective biological analysis and the anthropomorphic "values" in the definition. The DSEIS definition of "disturbance" is not, and cannot be, linked to objective wildlife data because we do not have a way to physiologically determine when human or other stimuli cause an ungulate to cross the "tranquility" or "composure" thresholds.

Proper interpretation of the regulations must incorporate two basic analytic foundations. First, the prohibition on "disturbance" need not focus solely on a "micro" level such as the interaction of a single human with a single elk. Second, one must consider whether potential "disturbance" can be avoided or mitigated through management. To proceed differently, as the DSEIS attempts, leads to absurd and impractical results. The DSEIS drafters undertake a thinly-disguised effort to portray snowmobiling as a "type" of activity that inexorably creates "disturbance" of the Parks' wintering ungulates. However, this approach cannot be rationally restricted to snowmobiling. When placed in proximity to humans, a bison will either stand still or move. In either instance some observable change in behavior or physiology will likely occur which the DSEIS drafters might find to be evidence of reduced "composure" or "tranquility."

The only logical way to reconcile these legal and practical issues is to base restrictions on types of human activity restrictions in the NPS system on objectively measurable and widespread impacts to resources. In the context of wildlife, this will generally require actual or foreseeable impacts to population levels or dynamics. The DSEIS drafters vigorously argue against this approach, because such a standard will force them to ignore the fact that ungulate populations in the Parks are at high and stable levels. *See*, DSEIS at 217 (acknowledging "winter recreation within the park has not clearly demonstrated any long term adverse consequences to populations..."). This is not to say that exceptional human misbehavior should be tolerated. Individuals "crossing the line" should be punished. Illegal behavior is not correlated with mode of access. Illegal behavior, whether by motorized or non-motorized visitors, should be the focus of law enforcement officers and federal magistrates, not NPS land managers. The DSEIS analysis of "wildlife" issues sets NPS up to arbitrarily pick and choose a prohibited activity *du jour*. Neither the law nor sound policy should sanction this approach.

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### III. Air Quality Issues.

The DSEIS establishes only the general proposition that every action alternative will improve the Parks' air quality.<sup>3</sup> The DSEIS presents an impressive looking series of acronyms and tables to summarize air quality issues. The information is beyond the understanding of most readers, and certainly lawyers. In fact, detailed analysis of air quality issues is logically beyond the technical capacity and legal authority of NPS. We join in, and incorporate by reference herein, the ISMA comments detailing why the Environmental Protection Agency and states are the proper entities to study and regulate air quality issues.

It is important to note at the outset that National Ambient Air Quality standards established under the Clean Air Act are not being violated in the Parks, even by present levels of snowmobiles using "old" technology. Additionally, we note that the modeling data used in the DSEIS analysis of air quality issues is incorrectly based on estimates of approximately 166,000 annual snowmobile days in the Parks, when available information suggests that about 65,000 actually enter the Parks in a typical season.

To the extent the DSEIS presents "numbers" about air quality, the numbers demonstrate quantifiable improvement associated with every action alternative. Lacking from this analysis is any meaningful context. For instance, Table 38 (DSEIS p. 171) compares the "numbers" for each alternative. The DSEIS attempts to compare these impacts by alternative with the descriptive terms used throughout the DSEIS, i.e. "negligible, minor, moderate, or major" effects. *See, e.g.*, DSEIS at 204-205. There are several flaws in this analysis. First, all comparisons are to a theoretical "no air quality impacts" baseline. The rationale for, or realistic possibility of, selecting such a "zero impact" baseline is not discussed. Second, the DSEIS attempts no discussion of the nature of the "equation" for air quality components. The relation of impacts to emission components might be linear, logarithmic, or some other relationship. Finally, the DSEIS lacks any meaningful discussion of how the identified levels will impact the human environment. For example, Table 38 suggests Alternative 2 will yield a 1-Hr. CO "rating" of 7.9 ppm at West Yellowstone, while Alternative 1a and 1b will result in a 4.5 "rating" and Alternative A produces a 32.2 "rating." What is not discussed is whether there is a distinction, in terms of compliance with any standard or with regard to human health, between the 7.9 and 4.5 "ratings." Put differently, the DSEIS appears to conclude that "more" air quality is always better but this conclusion is not self-evident. Both of these numbers may be below any reasonable threshold of human environmental "impact." This analysis must occur to render a properly-reasoned decision and to properly inform the public as to the consequences of the alternatives.

<sup>3</sup> By "air quality" we include the discussion of "health and safety" issues concerning vehicle emissions. The majority of such "health and safety" discussions focus on human exposure to emissions components, and are essentially a "second bite" at the air quality issue.

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The DSEIS fails to properly explain its methodology or conclusions concerning air quality for the "snowcoach" alternatives. Meaningful data on snowcoach emissions is lacking at this time. To the extent any data is available, it suggests snowcoach emissions greatly exceed snowmobile emissions. At a minimum, there is great uncertainty regarding this issue, which should be disclosed in the SEIS.

Even casual review of the proffered data shows the substantial improvements that will be provided by any of the proposed regulations. Alternative 2 strikes an appropriate balance, with substantial improvements in air quality while preserving a range of appropriate access options. Air quality is not the only issue before the agency, and any incremental benefit of other alternatives is more than outweighed by other costs associated by those options.

#### IV. Visitor Services Issues.

NPS units should be managed to provide a diverse range of opportunities for the public to enjoy Park resources. Those seeking solitude, "natural quiet," and wilderness experience can find it in the Parks and other NPS units. Conversely, the preferences of visitors placing a priority on those attributes should not exclude others from the Parks. The "Wyoming Survey" provides particularly important information about visitor preferences. Roughly seventy percent of Wyoming residents oppose a ban on snowmobile access to the Parks. DSEIS, Table 31. While the DSEIS drafters emphasize a "national" preference for more aggressive restrictions, such a result is not reflected in the Wyoming Survey results, where over sixty-five percent of nonresidents similarly oppose the snowmobile ban. DSEIS, Table 32. One cannot dispute the fact that the snowmobile is the chosen mode of access for the majority of current winter visitors to the Parks. The DSEIS does not contain credible information which compels elimination of snowmobiles from the Parks.

The "snowcoach only" alternatives will not provide a viable alternative to snowmobile access for many visitors. The DSEIS, like its predecessor, provides few practical details about the "snowcoach" alternatives. Our information suggests that NPS intends to develop a "new" snowcoach to address shortcomings of existing models and conversion kits. Lacking from the DSEIS is any discussion of the feasibility of the "new" snowcoach, its cost, whether existing concessionaires and rental outfitters can realistically purchase, maintain and operate such vehicles, and whether they will be accepted by the public. Snowmobiles are preferred by the majority of Parks' visitors because they allow the freedom and flexibility of self-directed travel. One can plan his or her own itinerary and choose to deviate from it as the day develops. Any alternative requiring snowcoach access or mandatory guides must evaluate these issues to determine how many visitors will continue to visit the Parks under such access restrictions.

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#### V. Socioeconomic Issues.

The DSEIS glosses over the negative socioeconomic impacts associated with elimination of meaningful snowmobile access to the Parks. Such shortcomings preclude adequate public disclosure of impacts required by NEPA.

The figures presented in the DSEIS do not accurately depict the magnitude of economic impact associated with a complete ban on snowmobile access to the Parks. Even if one assumes the DSEIS contains valid information, the actual impacts of reduced visitation are grossly understated. The DSEIS casually notes that "a majority of the 5-county impacts would be felt by the local West Yellowstone economy..." but downplays this impact given the relative significance of "Yellowstone" production in the 3-state region. DSEIS, p. 156. None of these projections considers whether snowcoach or reduced snowmobile access alternatives will support a viable winter economy in gateway communities. "Tourism" industries incur year-round fixed expenses and debt, which lead to regular cash flow requirements. Local resort owners and rental outfitters can juggle staffing and fuel purchases when traffic lags, but they cannot "postpone" payments for a mortgage, physical facility improvement, fleet rental, advertising, and other fixed overhead expenses, many of which are incurred long before any winter's first snow falls on the Parks. Thus, the conclusion that the impacts to West Yellowstone are "minor" or "short term" impacts of "only 8% in the year-round economy" ignore the concepts of debt-service and cash flow central to any business operation.

The local business owners provide the most knowledgeable information concerning issues such as visitor demand, marketing and price points, but this input is consistently contradicted or ignored by the DSEIS. For example, the DSEIS sugarcoats projected losses by suggesting that "new winter users would be attracted to YNP under the policy change and their increased visitation would serve to offset a portion of the estimated visitation losses detailed above." DSEIS, p. 155. Established operations have analyzed and developed the West Yellowstone winter tourism market and have questioned the validity of the "new market" reasoning. Assuming there is any validity to the analysis, no evidence is presented to support the attempt to quantify economic gains from these new visitors.

Substantial restrictions in snowmobile access will have real and tangible impacts in gateway communities. The DSEIS downplays these impacts by analyzing these impacts in broader contexts of annual revenue and regional economic production. These analyses will offer little comfort to the families who are forced to leave West Yellowstone, or the business owners who are forced to contract or liquidate their operations as a result of the Parks' new vision. Reasonable snowmobile access can continue, with appropriate restrictions to minimize resource impacts, while maintaining existing socioeconomic values. There is no benefit to be gained in exchange for even local socioeconomic costs associated with a snowmobile ban.

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#### VI. Procedural Concerns.

The DSEIS is another step in a decisionmaking process. The issues analyzed in this ongoing process have more to do with policy than substantive law. Still, the agency must adhere to certain procedural guidelines in presenting and evaluating its various decision options. In several instances the DSEIS strays near or beyond the boundaries of acceptable procedure.

The agency must "insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements." 40 C.F.R. § 1502.24. The agency must specifically "identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement." *Id.* Courts interpreting the Council on Environmental Quality NEPA regulations have determined that agencies must provide the public with hard data from which agency "experts" derived their opinion. *Idaho Sporting Congress v. Thomas*, 137 F.3d 1146, 1150 (9<sup>th</sup> Cir. 1998). In other words, an agency cannot present mere conclusions but must present and discuss sufficient information about technical analyses to support meaningful public input.

In several instances, the DSEIS appears to violate these standards. For instance, wildlife issues were studied, in part, through a compilation of "anecdotal observations" of Parks' employees choosing to provide this information. DSEIS, p. 117. This method is questionable, since it does not select participants based on objective criteria and does not incorporate random selection, but instead is designed to attract "motivated" participants. Regardless of the validity of the method, the "data" provided by these self-selected participants is not disclosed to the public. Similarly, hard data is lacking for any of the technical analyses presented in the DSEIS, and only tabular summaries are provided. Many of the narrative discussions on socioeconomic and visitor experience issues are not supported by "explicit reference by footnote to the scientific and other sources relied upon." 40 C.F.R. § 1502.24. The FSEIS must assign a larger role to science.

#### VII. Conclusion.

There is no legal or logical basis to eliminate snowmobile access to the Parks. The DSEIS improves upon its predecessor, but still demonstrates remnants of a predetermined and politically-driven plan to prohibit snowmobiles from the Parks. A ban cannot be justified based on "disturbance" to wildlife without reaching far beyond snowmobile access. There are no demonstrated advantages to air quality "improvements" of a ban over other alternatives. Parks visitors clearly favor the self-directed experience provided by snowmobile access, and this winter access now anchors a winter cash flow that makes a year-round economy possible in gateway communities. Alternative 2 is not perfect, but is a reasonable compromise which contains important new components to improve visitor satisfaction while better protecting the Parks' resources. Tempered by adaptive management principles and continued technological

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improvements, Alternative 2 will strike the best balance between the varied issues identified in the DSEIS.

We ask that you consider our input in crafting the FSEIS, and respectfully request that you select Alternative 2 at the conclusion of this decisionmaking process.

Very truly yours,

MOORE SMITH BUXTON & TURCKE,  
CHARTERED

  
Paul A. Turcke

/PAT



May 24, 2002

Winter Use Draft Comments  
Grand Teton and Yellowstone National Parks  
P.O. Box 352  
Moose, Wyoming 83002

To Whom It May Concern:

The National Alliance of Gateway Communities (NAGC) respectfully submits these comments with regard to the Supplemental Draft Environmental Impact Statement (SEIS) for the Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway.

The NAGC is the national trade association that represents the interests of those communities that serve as gateways for millions of visitors to our national parks, forests and other Federal public lands. No one loves these national treasures more than those who have chosen to live as their neighbors. And no one is more affected in their daily lives and in their businesses by policies, programs and activities pertaining to those Federal lands.

We commend the Department of Interior and the National Park Service for revisiting the 2000 Environmental Impact Study (EIS) and for considering a range of alternatives that would substantially modify that document. The NAGC strongly opposed the Final Rule that resulted from what we regarded as a flawed EIS. We believed then and now that the ban then imposed on all snowmobile access to the three areas was politically motivated, scientifically unfounded and failed to give sufficient consideration to its impact on affected gateway communities.

We support Alternative 2 as the preferred approach that will balance environmental goals with the needs and desires of gateway communities and the American public that wants winter access to these Parks. We oppose all other alternatives.

The SEIS clearly presents a more balanced and reasonable analysis than did the EIS. We would like to see more attention paid, however, to the economic impact of each of the alternatives on gateway communities. We understand that the national parks have national missions that must remain paramount and that the interests of nearby communities should not override the national interest. But this does not mean that the impact of policy changes on gateways should be disregarded. The goal should be to strike a balance that maintains the environment and the resources of the national parks for future generations for future generations to use and enjoy. With regard to gateway

communities, we urge that the first rule that a national park should follow is: *First, Do No Harm.*

We are convinced that only Alternative 2 provides that balance in this situation. We do not believe a case has been made scientifically that snowmobiles – even at current use levels – damage the environment or the wildlife in these three parks. The use of better management and enforcement techniques by Park staff and the advent of cleaner, quieter snowmobiles will mitigate any negative impact that may occur. We understand that the experience at Yellowstone National Park during the past winter with the "Pilot Project," deploying additional rangers for better enforcement and other staff for expanded public education efforts produced very encouraging results.

We believe that it is critical for gateways and for the American public that historic levels of visitation into these Parks be maintained. We urge that this principle be incorporated into the Final SEIS. If this is followed, the economies of gateway communities will be protected and the right of the public to use and enjoy their national parks as they prefer will be preserved. Only Alternative 2 is consistent with this principle. Snowcoaches are unreliable and uncomfortable and will not be comparable replacements for snowmobiles. You can build them but the public will not come. The clear preference of the public for more than two decades is to see Yellowstone and the other parks by snowmobile, not snowcoach.

We strongly support adoption of Alternative 2 in the Final SEIS.

Sincerely,

 A handwritten signature in black ink, appearing to read "Aubrey C. King".
 

Aubrey C. King  
President



May 27, 2002

Planning Office  
Grand Teton and Yellowstone National Parks  
P.O. Box 352  
Moose, WY 83012

Re: Winter Use Draft SEIS Comments

Dear Planning Office:

The Washington State Snowmobile Association is in support of Alternative 2 identified in the Draft SEIS. Washington snowmobilers that travel to the Parks believes that individual travel by snowmobile provides the best way to experience the beauty and special character of the Parks in the winter, yet we realize there must be reasonable constraints and aggressive management.

There are a good number of features in Alternative 2 that we believe makes this approach appropriate for a final winter use plan. We support the following concepts:

1. Implementation of a reservation system and interim daily entry limits for snowmobiles, based on historic daily averages, until a long-term visitor capacity study is completed. We also support spreading snowmobile use over a mid-December to mid-March winter season.
2. Advance sale of park entrance permits, but encourage the NPS to make them more readily visible to help reduce the bottleneck at entrance gates.
3. Lowering the speed limit to 35 mph from West Yellowstone to Old Faithful to improve safety, reduce sound levels and mitigate potential conflicts, plus strict enforcement of all posted speed limits within the Parks.
4. Requiring cleaner and quieter snowmobiles for entry to the Parks. However, the Environmental Protection Agency ("EPA") should determine appropriate emission levels for all snowmobiles, rather than the NPS dictating "park-only" regulations. Similarly, sound level regulation for snowmobiles should be established through appropriate processes using SAE test protocols.
5. Strict enforcement of regulations that prohibit off-road travel and restrictions on non-motorized uses in wildlife winter ranges and fragile thermal areas.
6. Increase groomed non-motorized trails and increase both the size and number of warming huts to help mitigate perceived user conflicts.
7. Guidelines restricting travel on Park roads from 8 pm until 7:30 am.
8. Expanding educational opportunities that inform winter visitors regarding Park rules, user ethics, visitor safety and appreciation of Park resources.
9. Fostering partnerships with the surrounding communities, counties and states. This should be expanded to include organized user groups.

In conclusion, we firmly believe Alternative 2 is the best alternative for the Parks and for the visitors and can still allow for a quality snowmobile and snowcoach experience for the winter visitors. Your consideration of this perspective is greatly appreciated.

Sincerely,

Glenn Warren, President  
Washington State Snowmobile Association  
442 Bundy Hollow  
Dayton, WA 99328



"Allen & Associates"  
<allenassociates@qwest.net>

To: grte\_winter\_use\_seis@nps.gov  
CC:  
Subject: Winter Use Draft SEIS Comments

05/29/2002 02:47 PM  
CST  
Please respond to "Allen & Associates"

May 28, 2002

Winter Use Draft SEIS Comments  
Grand Teton & Yellowstone National Parks  
P.O. Box 352  
Moose, Wyoming 83012

Dear National Park Management Team:

On behalf of the Western Environmental Trade Association (WETA) I am writing in support of the concepts contained in Alternative 2 of the SEIS that was developed by the Cooperating Agencies.

WETA, organized in 1976, is a coalition of representatives of agriculture, labor, business, commercial industry, the scientific community, recreation, transportation and twenty-two other trade associations. The people who work in these resource-related industries in Montana also enjoy the recreational opportunities available, including snowmobiling. WETA supports Alternative 2 because it continues to allow snowmobile access to the Parks on an individual and personal basis. The spectacular natural features of the Parks are even more unique and breath-taking when viewed in the winter by individual travel by snowmobile. We also support the following:

- Reasonable limits on snowmobile numbers.
- The advance sale of park entry permits to reduce congestion problems at the Park's entrance.
- Adequate numbers of park rangers to insure security and guidance.
- Strict enforcement of speed limits and that speed should not exceed 35 mph.
- No off trail travel should be allowed.
- That winter access to certain areas should be restricted.
- Implementation of an Adaptive Management Plan for the Parks' operations.

We strongly urge that cooperating partnerships be developed with gateway communities, surrounding counties and states in order to expand resources for education and orientation purposes for winter visitors. Emphasis should be on rules, ethics, safety and the appreciation of the Park's special characteristics.

Thank you for the opportunity to submit these comments on behalf of the members of WETA.

Sincerely,

Don Allen, Executive Director  
Western Environmental Trade Association  
33 S. Last Chance Gulch, Suite 2A  
Helena, MT 59601



Wyoming  
State Snowmobile Association, Inc.

A BETTER WYOMING ECONOMY THROUGH BETTER SNOWMOBILE PROGRAMS

5/23/2002

Winter Use Draft SEIS Comments  
Grand Teton and Yellowstone National Parks  
PO Box 352  
Moose, WY 83012

Dear Superintendents,

The Wyoming State Snowmobile Association supports Alternative 2 in the Draft Supplemental Environmental Impact Statement for Yellowstone and Grand Teton National Parks and the John D Rockefeller Parkway. WSSA feels that adaptive management should be used to mitigate the impacts of all users on the natural resources. Advances in all areas are being made on a daily basis. To eliminate any user based on outdated data is wrong.

WSSA supports the "cleaner-quieter" snowmobiles for entry into National Parks as per the guidelines set by the EPA, not "park only" regulations. The snowmobile industry is making great strides in developing environmentally friendly machines.

WSSA supports strict enforcement of the designated road rule for snowmobiles. This has always been our stand. With the ability to fund rangers through the Wyoming fees off road infractions can be minimized.

The snowcoach only approach has not been researched thoroughly enough to present as a viable alternative. The study contracted by the State of Wyoming shows the fallacy of the snowcoach as a cleaner or more cost effective solution. WSSA does not support that alternative. The Mattrack conversions are very weighty and leave ruts that create hazards and safety concerns.

WSSA does not support narrowing the season. Many of the best snowmobiling days occur after the month of February. As it stands today the season is shorter than we would like to see but we are not requesting additional days.

WYOMING'S <sup>234</sup><sub>24</sub> MILLION DOLLAR WINTER SPORT



Wyoming  
State Snowmobile Association, Inc.

A BETTER WYOMING ECONOMY THROUGH BETTER SNOWMOBILE PROGRAMS

West Yellowstone, MT has utilized advance sale of park permits during the last season. This should reduce the impact on rangers at the west entrance to Yellowstone National Park. This also creates an opportunity to educate entrants into the park. WSSA supports any and all educational efforts for all users.

After experiencing the lower speed limits between West Yellowstone and Old Faithful this past winter season I feel this should not present a problem for the user. It creates an opportunity to experience the Park in a more leisurely fashion.

WSSA supports daily entry limits if they are based on historical data. We also support a long term visitor study to determine verifiable data. Individual access is important to the WSSA. Members of the WSSA frequently spend time in the Parks and it is always a requested trip by visitors. The Yellowstone Park experience on a snowmobile is truly a once in a lifetime for many users and the number of visitors who choose snowmobiles for this experience shows its popularity. It would be a mistake not to take this into account in the determination of winter use.

Additionally WSSA encourages the inclusion of economic data regarding impacts to the surrounding communities as well as to the State of Wyoming as a whole. People should not be left out of the equation. All users count, we all have a stake in preserving as well as enjoying the beauty of our National Parks. No user group has the right to exclude another. Education, respect and tolerance for our diverse experiences should enable us to co-exist and recreate on public lands.

Respectfully Submitted

*Teri Manning*  
Teri Manning, President  
Wyoming State Snowmobile Association  
PO Box 1858  
Casper, WY 82602  
teri@snomobilewyoming.org

WYOMING'S <sup>234</sup><sub>24</sub> MILLION DOLLAR WINTER SPORT



## YELLOWSTONE

### CHAMBER OF COMMERCE

May 15, 2002

Winter Use Draft SEIS Comments  
Gard Teton and Yellowstone National Parks  
PO Box 352  
Moose, WY 83012

Dear Superintendents Martin and Lewis,

This letter is written to officially register our comments on the Draft Winter Use Supplementary Environmental Impact Statement for Yellowstone and Teton National Parks. We feel it is appropriate for our organization to state that we support Alternative 2 since it is most closely aligned with the results of a membership poll we initiated.

The poll, taken in the fall of 1999, was sent to our entire membership of 213. The purpose was to determine their support or opposition to modified Alternative E of the DSEIS regarding winter use in Yellowstone and Teton National Parks. We achieved a 50% return on that poll and of those 98% supported modified Alternative E. This alternative, as you know, would have permitted continued snowmobile use in the Parks. It was tied to increasing the use of cleaner and quieter snowmobiles and a proportionate decrease in the then current two-stroke machines. It was based on adaptive management that could be adjusted as new technology developed. Thus, it provided a judicious means by which both the Parks and the gateways would benefit.

Gateway communities such as West Yellowstone fulfill an important role in the mission to preserve and protect the parks by providing services beyond their borders. These services include meeting the needs not only of visitors but of park personnel as well. Our relationship is symbiotic—enhanced by both. It is, therefore, essential that decisions reflect accountability to our joint mission to protect these natural National treasures and the continued viability of the communities involved.

Of primary concern to us is that historic winter use levels be maintained. This will call for a realistic evaluation of the resources that can be brought to bear to assure those

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Page 2: Winter Use Draft SEIS Comments  
May 15, 2002

levels, the availability of those resources and the time frame for any transition. These will be the key to this community's survival. We must be concerned not only the final result of any transition but also with what happens in the process.

We, as your partners, thank you for your time and attention to our comments.

Sincerely,

  
Jeff Kurtz, President

**YELLOWSTONE****CHAMBER OF COMMERCE**

**To:** Winter Use Draft SEIS  
Grand Teton and Yellowstone National Parks

**From:** Marysue Costello **Date:** May 29, 2002  
West Yellowstone Chamber of Commerce

**Re: Comments**

The enclosed are a duplicate of the joint letter from the Gateway Communities. Gardiner, Montana's was not able to be included until after the Fed Ex pick-up yesterday and so I've just re-copied everyone's and sent them along.

Thank you.

P.O. Box 458, West Yellowstone, MT 59758  
406-646-7701 • fax: 406-646-9691 • [www.westyellowstonechamber.com](http://www.westyellowstonechamber.com)

May 25, 2002

Winter Use Draft SEIS Comments  
Grand Teton and Yellowstone National Parks  
PO Box 352  
Moose, WY 83012

Dear Superintendents Martin and Lewis,

This letter is written to officially register our joint comments on the Draft Winter Use Supplementary Environmental Impact Statement for Yellowstone and Teton National Parks.

Gateway communities fulfill an important role in the mission to preserve and protect the parks by providing services beyond their borders. These services include meeting the needs not only of visitors but of park personnel as well. Our relationship is symbiotic. It is, therefore, essential that decisions take into account the protection of these natural National treasures and the continued viability of the communities involved.

Of primary concern to Yellowstone's gateways in this SEIS process is that historic winter use levels be maintained. This will call for a realistic evaluation of the resources that can be brought to bear to assure those levels, the availability of those resources and the time frame for any transition. Of the options offered within the DSEIS, we jointly support Alternative 2 since we believe it offers the best adaptive management plan, and thus, the highest probability for maintaining winter use levels.

As your partners, we thank you for your time and attention to our comments.

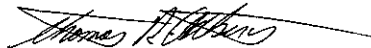
Sincerely,

President  
Cody Chamber of Commerce

President  
Cooke City Chamber of Commerce

President  
Gardiner Chamber of Commerce

President  
Jackson Chamber of Commerce

  
President  
West Yellowstone Chamber of Commerce